

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In Re: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

CASE NO: 2:15-MD-02641-DGC
MDL No. 2641

This Document Relates to:

2:16-cv-01464
Robert Eason vs. Bard, et al.

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiff seeks leave to file the attached short form complaint to correct Paragraph 2 and add Plaintiff's spouse, Paragraph 7 to add the District Court and Division and Paragraph 12, Count XIV to read "Violations of Applicable **Georgia** Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices" instead of "Violations of Applicable Georgia and Pennsylvania Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices." (see Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).

2. Plaintiff's counsel has conferred with Defendants' counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, Robert Eason requests that this Court grant this request to add the Plaintiff's spouse to Paragraph 2, the District Court and Division to paragraph 7 and for substitution of Georgia in Paragraph 12, Count XIV, and for leave to file the Amended Second Amended Master Short Form Complaint for Damages for Individual Claims and Demand for

Jury Trial, and direct the Clerk to file the attached Amended Second Amended Master Short Form Complaint.

Dated: July 9, 2016

/s/ Joseph R. Johnson

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson